

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DR. DAVID S. FIELD

Plaintiff,

Index No. 1:21-cv-01990 (JGK) (SLC)

vs.

EXPONENTIAL WEALTH INC.,  
RYAN MURNANE, RYAN MICHAELS,  
KRYSTALYNNE MURNANE, NOLAN  
BENNETT, AND CHRISTOPHER PAUL

**ORDER TO SHOW CAUSE FOR  
DEFAULT JUDGMENT AGAINST  
DEFENDANT CHRISTOPHER PAUL**

Defendants.  
----- X

*Accompanying*  
Upon the annexed Declaration of Sara F. Lilling, Esq., dated January 3<sup>rd</sup> 2022, and the  
exhibits annexed thereto, and upon all prior papers and proceedings heretofore had herein, it is

ORDERED, that Defendant Christopher Paul show cause before this Court, located at  
500 Pearl Street, New York, New York, on by January 19, 2022,  
~~2022 at 9:30 o'clock in the forenoon~~  
~~thereof, or as soon thereafter as counsel may be heard,~~ why an Order should not be issued  
pursuant to Rule 54 (b) and Rule 55(b) of the Federal Rules of Civil Procedure in favor of  
Plaintiff Dr. David S. Field, for the following relief:

- i. Pursuant to FRCP Rule 55(b)(2), directing that a default judgment be entered in favor of Plaintiff against Defendant Paul in the amount of \$2,885,852 plus interest; and it is further

ORDERED, that Defendant Paul shall respond in writing to this Order to Show Cause for a default judgment on or before January 19, 2022. If Defendant Paul fails to respond by that date, judgment may be entered against him and Defendant Paul will have no trial. Plaintiff may reply by January 21, 2022; and it is further

ORDERED, that service of a copy of this Order, along with the annexed Declaration of Sara F. Lilling, Esq. and the *Accompanying* exhibits annexed thereto, and the annexed Proposed Judgment upon

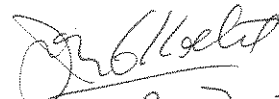
Defendant Paul at his last known address at 136 Minna Avenue, Avenel, New Jersey 07001, on or before January 10, 2022, shall be deemed good and sufficient service thereof; it is further

ORDERED, that Plaintiff shall file proof of service of this Order to Show Cause on or before January 12, 2022.

  
JUDGE JOHN G. KOELTL

1/5/22

*No personal appearance in response  
to this Order to Show Cause is scheduled.*

  
1/5/22 U.S.D.J.

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Index No. 1:21-cv-01990 (JGK) (SLC)

**PROPOSED DEFAULT  
JUDGMENT AGAINST  
DEFENDANT CHRISTOPHER PAUL**

This matter having come before this Court on Plaintiff Dr. David S. Field's application for entry of a default judgment against Defendant Christopher Paul ("Defendant Paul"), under Rule 55(b)(2) of the Federal Rules of Civil Procedure; and after having considered Plaintiff's submissions, the Court finds as follows:

(1) A Certificate of Default was issued by the Clerk of the Court against Defendant Paul on December 22, 2021;

(2) Defendant Paul is not a minor, an incompetent person, or a member of the military service of the United States; and

(3) Defendant Paul did not file an Answer or otherwise appear in this action.

THEREFORE, IT IS ADJUDGED that Plaintiff shall have judgment over and against Defendant Paul in the amount of \$2,885,852 plus interest, and that Plaintiff shall have execution therefor.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_  
JUDGE JOHN G. KOELTL

UNITED STATES DISTRICT COURT  
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DR. DAVID S. FIELD

Plaintiff,

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Defendants.  
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**DECLARATION OF**  
**SARA F. LILLING, ESQ.**

SARA F. LILLING, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an associate with the law firm of Mound Cotton Wollan & Greengrass, LLP, attorneys for Plaintiff Dr. David S. Field ("Plaintiff" or "Field"). As such, I am fully familiar with the facts and circumstances of this action.

2. I submit this Declaration in support of Plaintiff's order to show cause for default judgment against Defendant Christopher Paul ("Paul").

3. Plaintiff commenced this action by filing a Verified Complaint on March 8, 2021. A copy of the Verified Complaint (Doc. 1) is annexed hereto as Exhibit A. In this action, Plaintiff seeks damages against the defendants in the amount of \$2,885,852 plus interest. Id.

4. Thereafter, on October 15, 2021, Plaintiff filed an Amended Verified Complaint, naming Defendant Paul as an additional defendant. A copy of the Amended Verified Complaint (Doc. 50) is annexed hereto as Exhibit B.

5. A Summons and a copy of the Amended Verified Complaint were served on Defendant Paul on November 4, 2021. A copy of the Affidavit of Service on Defendant Paul (Doc. 67) is annexed hereto as Exhibit C.

6. A Clerk's Certificate of Default was entered against Defendant Paul on December 22, 2021. A copy of the Clerk's Certificate of Default against Defendant Bennet (Doc. 82) is annexed hereto as Exhibit D.

7. To date, Defendant Paul has not filed an Answer or otherwise moved with respect to the Amended Verified Complaint, and his time to do so has expired.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York  
January 3, 2022

/s/ Sara F. Lilling  
SARA F. LILLING